



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

Certified Mail: Z745800774
Return Receipt Requested

APR 19 1996

Harry C. Stonecutter, President
McDonnell-Douglas
McDonnell and Airport Roads
St. Louis, Missouri 63134

Re: General Notice Letter and Invitation to Informational Meeting
Waste Disposal, Inc. Superfund Site
Santa Fe Springs, California

Dear Mr. Stonecutter:

The United States Environmental Protection Agency ("EPA") is spending public funds to investigate and control releases or potential releases of hazardous substances, pollutants or contaminants at the Waste Disposal, Inc. Superfund Site ("Site"), in Santa Fe Springs, California. Under Sections 106(a) and 107(a) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), commonly known as Superfund, Potentially Responsible Parties ("PRPs") may be required to perform cleanup actions to protect the public health, welfare, or the environment. PRPs may also be responsible for all costs incurred by EPA in responding to any release or threatened release at the Site. PRPs include current and former owners and operators of facilities at which hazardous substances were disposed of, persons who arranged for the disposal of hazardous substances at a facility ("generators"), and persons who accepted hazardous substances for transport to a facility ("transporters"). The purpose of this letter is to inform you that EPA considers your company to be a PRP at the Site.

EPA has evaluated information obtained through its investigation of the Site, and has determined that your company is a PRP as a generator. EPA has reason to believe that your company did by contract, agreement, or other mechanism arrange for the disposal, treatment or transportation of hazardous substances at the Site. Information relating to your involvement with this Site is enclosed.

Your company is one of seventeen newly identified PRPs ("the newly identified PRPs") who are receiving this general notice letter. The names and addresses of all the newly identified PRPs are set forth on the attached list of addressees. As discussed below, certain other PRPs were identified previously ("the previously identified PRPs") and have been cooperating with EPA in performing site work.

EPA has conducted a Remedial Investigation/Feasibility Study ("RI/FS") at the Site. The Proposed Plan, based on the results of the RI/FS, was released for public comment in August, 1993 and contained various remedial action alternatives. After reviewing the public comments on the RI/FS, EPA selected the remedial action which is outlined in the Record of Decision ("ROD") for the Site issued on December 27, 1993. The ROD is attached for your information. The remedial action selected in the ROD is to be implemented during the Remedial Design/Remedial Action ("RD/RA") period by the potentially responsible parties ("PRPs"). The RD has been substantially completed by the previously identified PRPs, but to date there has been no formal agreement for these same parties to perform the RA. EPA encourages you to work with the previously identified PRPs to voluntarily perform or finance those response activities that EPA determines are necessary at the Site.

EPA encourages good faith negotiations between your company and the Agency, as well as coordination among your company and the other parties who are potentially responsible for contamination at the Site. The previously identified PRPs have formed a steering committee at the site (consisting of the eight PRPs who are currently performing RD work at the Site.) EPA believes that a PRP Steering Committee is usually the best vehicle for establishing and maintaining coordinated and constructive dialogue both within the PRP group itself and between PRPs and the Agency. For your information and to facilitate organization we have enclosed the names and addresses of the PRPs currently participating in the Steering Committee, and the names and addresses of the PRPs who have been notified to date. The common counsel for the steering committee is Shelby Moore and the project coordinator is Ian Webster of Unocal. Their phone numbers are included in the attachment to this letter.

In the near future (prior to June 30, 1996), EPA may send you special notice under the authority of Section 122(e) of CERCLA, 42 U.S.C. § 9622(e), regarding performance of the RA. This section provides EPA with the option to invoke "special notice procedures," through which EPA provides notice to interested parties of anticipated actions. Special notice procedures trigger a moratorium on certain EPA activities at the Site and allow an opportunity for noticed parties to negotiate with EPA to finance or conduct Site activities. EPA would, at that time, approach you and other PRPs at the Site receiving special notice to discuss your involvement in implementing the RA. If EPA does not use Section 122(e) special notice procedures, EPA will send a letter explaining why the special notice procedures were not used in this case.

Informational Meeting

EPA will hold an informational meeting for all newly identified PRPs on Wednesday, May 8, 1996 at 10:00 a.m. in the EPA regional office. The meeting will take place in the Marianas/Guam Rooms, located on the first floor of 75 Hawthorne Street in San Francisco. The common counsel and the project coordinator for the steering committee will also be present at that time. We encourage your attendance at the meeting, as we believe it will provide the best forum for presenting important information relating to the site and discussing the framework for the upcoming RA negotiations.

With respect to the RA negotiations, EPA believes that a range of options may exist for the newly identified PRPs, from full participation in the RA process (through membership on the steering committee), at one end of the range, to payment of past costs or some other type of cashout arrangement, on the other. However, we would emphasize that the initial meeting will be informational and not a negotiation session. Accordingly, in order to reduce transaction costs for all parties, we are suggesting that each newly identified PRP send no more than two representatives (e.g., a technical project person and an attorney) to this first meeting.

Administrative Record

Pursuant to Section 113(k) of CERCLA, EPA must establish an administrative record file that contains documents that form the basis of EPA's decision on the selection of a response action for a Site. The administrative record file, which contains the documents related to the response action selected for this Site, is available to the public for inspection and comment.

The administrative record file for the Waste Disposal, Inc. site is available for inspection at EPA's Regional Office in San Francisco, located at 95 Hawthorne Street, 4th floor; and at the City of Santa Fe Springs Public Library, 11710 Telegraph Road, Santa Fe Springs, CA.

Please provide EPA with the name, address, and telephone number of the person to whom EPA should direct future correspondence on behalf of your company. If you are already involved in discussions with State or local authorities, are engaged in voluntary clean-up action, or are involved in a lawsuit regarding the Site, you should continue such activities as appropriate. This letter is not intended to advise you or to direct you to restrict or to discontinue any such activities; however, you are advised to report the status of those discussions or actions in your response to this letter, and to provide a copy of the response to any other parties involved in those discussions or actions.

Your response should be made in writing and submitted to EPA within thirty (30) days of receipt of this letter. Your response should be directed to:

Rusty Harris-Bishop
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street (H-7-2)
San Francisco, CA 94105

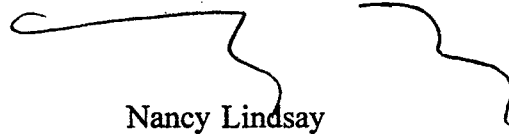
Please direct any technical questions with respect to the Site to Mr. Harris-Bishop at (415) 744-2363.

Please direct any legal questions to:

Lewis Maldonado
U.S. Environmental Protection Agency, Region IX
Office of Regional Counsel, RC-3-2
75 Hawthorne Street
San Francisco, California 94105
(415) 744-1342

Thank you for your attention to this matter.

Sincerely,



Nancy Lindsay
Chief, Superfund Enforcement Branch
Hazardous Waste Management Division

Enclosures

cc: Kathleen H. Wong, Counsel
McDonnell Douglas West Coast Law Department
10775 Business Center Drive (206-1)
Cypress, CA 90630

ADDRESSEES

- 1) James R. Randall, President
Archer Daniels Midland
4666 E. Faries Parkway
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cc: Scott A. Roney, Senior Attorney
- 2) Curtis H. Barnette, President
Bethlehem Steel Corporation
1170 Eighth Avenue #2059
Bethlehem, PA 18016-7699
cc: Edwin B. Wilson, Director
Environmental Assessment and
Remediation
cc: E.G. Laver, Esquire
- 3) M.A. Ferrucci, President
Richfield Oil Company
1209 Orange Street
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cc: Scott A. Lehecka, Senior Attny
ARCO
444 South Flower St.
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- 4) Harry C. Stonecutter, President
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cc: Kathleen H. Wong, Counsel
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- 5) C.S. Nicandros, President
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600 North Dairy Ashford
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cc: Derrick Hobson, Counsel
- 6) J.C. Weaver, President
Hughes Aircraft Company
7200 Hughes Terrace
Los Angeles, CA 90045
cc: Cynthia E. Geerdes, Senior
Attny
- 7) Lee R. Raymond, President
Exxon Corporation
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cc: D.R. Roberson, Prod. Dept.
Exxon Company, U.S.A.
P.O. Box 2180
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- 8) Blaine R. Hess, President
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800 Sylvan Avenue
Englewood Cliffs, NJ 07632-3201
cc: Andrew Shakalis, Senior
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Lever Brothers Company
390 Park Avenue
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- 9) J.I. Hathaway
Hathaway Oil Company
P.O. Box 3404
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cc: Robert E. Atkinson, Attorney
Atkinson and Gibson
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13225 Philadelphia Street
Whittier, CA 90608
- 10) Kenneth W. Reese, President
Tenneco Oil Company
1010 Milam Street
Houston, TX 77002
cc: Laurent B. Webb, Attorney

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| <p>11) Roy C. Dolley, President
Atlantic Oil Company
310 East Colorado Street
Suite 200
Glendale, CA 91205
cc: Max K. Jamison
37879 Upper Road
Angelus Oaks, CA 93205</p> <p>12) Gordon M. Anderson, CEO
Santa Fe International Corporation
5420 LBJ Freeway #1100
Dallas, TX 75240</p> <p>13) Richard K. Davidson, CEO
Union Pacific Corporation
Martin Tower
Bethlehem, PA 18018</p> <p>14) Richard A. Drexler, CEO
Allied Products Corporation
10 South Riverside Plaza
Chicago, IL 60602</p> | <p>15) Albert B. Bersticker, President
Ferro Corporation
1000 Lakeside Avenue
Cleveland, OH 44114</p> <p>16) Philip E. Kamins, CEO
PMC/Productol
12243 Branford Street
Sun Valley, CA 91325</p> <p>17) Frank H. Richardson
Shell Oil company, Inc.
One Shell Plaza
Houston, TX 77001
cc: Nela Brown
Shell Oil Company
P.O. Box 2463
Houston, TX 77252</p> |
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STEERING COMMITTEE MEMBERS

<i>CONTACT</i>	<i>REPRESENTING</i>	<i>PHONE NUMBER</i>
Ian Webster, Project Coordinator	Unocal	714/577-2955
Ed Bourke, Technical Consultant	C2REM	714/261-8098
Shelby Moore, Attorney	Common counsel	805/498-3279
Tony Garvin, Attorney	Dresser Industries	415/442-1620
Mike Skinner, Technical Contact	Mobil Corporation	609/737-6168
John Wolff, Technical Contact	Chevron USA, Inc.	510/242-4252
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Donald Conant, Attorney	FMC	408/289-3284